

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

WELLPATH HOLDINGS, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-90533 (ARP)

(Jointly Administered)

**AGENDA OF MATTERS  
SET FOR HEARING ON FEBRUARY 24, 2025  
AT 2:00 P.M. (PREVAILING CENTRAL TIME)**

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The above-captioned debtors and debtors in possession (collectively, the “Debtors”) file this amended agenda of matters set for hearing on **February 24, 2025 at 2:00 p.m. (prevailing Central Time)**, before the Honorable Judge Alfredo R. Pérez to consider the following:

**Matters Going Forward**

**1. Motions for Relief from the Automatic Stay.**

Status: Going forward

Related Documents:

- a. Plaintiff Josph Mrozek’s Motion for Relief from the Automatic Stay to Allow the Pending Personal Injury Claims Against the Debtor to Proceed [Docket No. 613] filed by Joseph Mrozek;
- b. Notice of Request to Proceed in State Civil Action [Docket No. 767] filed by Omar Rivera;
- c. Motion for Relief from Automatic Stay to Proceed With Litigation Pending Before Non Bankruptcy Forum [Docket No 1014] filed by Maria Elena Garcia;

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<sup>1</sup> A complete list of the Debtors (as defined below) in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/Wellpath>. The Debtors’ service address for these chapter 11 cases is 3340 Perimeter Hill Drive, Nashville, Tennessee 37211.

- d. Debtors' Second Omnibus Objection to Motions for Relief from the Automatic Stay [Docket No. 1336];
  - e. Supplemental Declaration of Yana G. Henriks in Support of Motion for Relief from Stay, Action Pending in Non-Bankruptcy Forum [Docket No. 1499]; and
  - f. Debtors and Debtors in Possession Amended Witness and Exhibit List for February 24, 2025 Hearing at 2:00 p.m. (Prevailing Central Time) [Docket No. 1505].
2. **Disclosure Statement Hearing.** Debtors' Motion for Entry of an Order (I) Approving the Adequacy of the Disclosure Statement, (II) Approving the Solicitation and Notice Procedures with Respect to Confirmation of the Debtors' Proposed Joint Plan or Reorganization, (III) Approving the Forms of Ballots and Notices in Connection Therewith, (IV) Scheduling Certain Dates with Respect Thereto, and (V) Granting Related Relief [Docket No. 567].

Status: This matter is going forward.

Related Documents:

- a. Declaration of Timothy J. Dragelin as Chief Restructuring Officer and Chief Financial Officer of Wellpath Holdings, Inc. and Certain of its Affiliates and Subsidiaries in Support of the Debtors' Chapter 11 Petitions and First Day Pleading [Docket No. 20];
- b. Joint Chapter 11 Plan of Reorganization of Wellpath Holdings, Inc. and Certain of Its Debtor Affiliates [Docket No. 564];
- c. Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Wellpath Holdings, Inc. and Certain of its Debtor Affiliates," dated December 20, 2024 [Docket No. 566];
- d. Certificate of Service [Docket No. 588];
- e. Objections of Claimants to Debtors' Disclosure Statement for Plan of Reorganization [Docket No. 993];
- f. Objection of Cobb County, Georgia, and Cobb County Sheriff to Debtor's Motion for Entry of an Order (I) Approving the Adequacy of the Disclosure Statement, (II) Approving the Solicitation and Notice Procedures with Respect to Confirmation of the Debtor's Proposed Joint Plan of Reorganization, (III) Approving the Forms of Ballots and Notices in Connection Therewith, (IV) Scheduling Certain Dates with Respect Thereto, and (V) Granting Related Relief [Docket No. 1004];

- g. Claimants Gracienne Myers and Daniel Myers' Objection to Reorganization Plan (ECF 546, 566, 567) and Joinder & Adoption of Objection to Wellpath's Disclosure Statement Filed in Support of Reorganization Plan Filed by Claimants Capaci, Graham & Moone (ECF 993 & Conn County Georgia (ECF 1004) [Docket No. 1007];
- h. Plaintiff-Creditors Joinder with the Objections of Claimants to Debtor's Disclosure Statement for Plan of Reorganization [Docket No. 1012];
- i. Notice of Rescheduled Disclosure Statement Hearing [Docket No. 1026];
- j. Notice of Status Conference [Docket No. 1047];
- k. The Statutory Unsecured Claimholders' Committee's Objection to Debtors' Motion for Entry of Order (I) Approving the Adequacy of the Disclosure Statement, (II) Approving the Solicitation and Notice Procedures with Respect to Confirmation of the Debtor's Proposed Joint Plan of Reorganization, (III) Approving the Forms and Ballots of Notices in Connection Therewith, (IV) Scheduling Certain Dates with Respect Thereto, and (V) Granting Related Relief [Docket No. 1048];
- l. Notice of Rescheduled Disclosure Statement Hearing [Docket No. 1160];
- m. Stipulation and Agreed Order Regarding (A) the Schedule Set Forth in Debtors' Motion for Entry of Order (I) Approving the Adequacy of the Disclosure Statement, (II) Approving the Solicitation and Notice Procedures with Respect to Confirmation of the Debtors' Proposed Joint Plan of Reorganization, (III) Approving the Forms of Ballots and Notices in Connection Therewith, (IV) Scheduling Certain Dates with Respect Thereto, and (V) Granting Related Relief and (B) the Statutory Unsecured Claimholders' Committee's Emergency Motion to Extend the Deadlines for (I) the Bid Procedures Order and (II) the Solicitation Procedures Motion [Docket No. 1195];
- n. United States Trustee's Objection to Approval of Disclosure Statement for the Joint Chapter 11 Plan of Wellpath Holdings, Inc. and Certain of its Debtor Affiliates [Docket No. 1271];
- o. Notice of Filing of First Amended Joint Chapter 11 Plan of Reorganization of Wellpath Holdings, Inc. and Certain of Its Debtor Affiliates [Docket No. 1307];
- p. Notice of Filing of First Amended Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Wellpath Holdings, Inc. and Certain of its Debtor Affiliates [Docket No. 1308];

- q. Notice of Filing of Revised Order (I) Approving the Adequacy of the Disclosure Statement, (II) Approving the Solicitation and Notice Procedures with Respect to Confirmation of the Debtors' Proposed Joint Plan or Reorganization, (III) Approving the Forms of Ballots and Notices in Connection Therewith, (IV) Scheduling Certain Dates with Respect Thereto, and (V) Granting Related Relief [Docket No. 1310];
- r. Claimants Gracienne Myers and Daniel Myers' Objection to Debtors' Revised Disclosure Statement and Revised Reorganization Plan [Docket No. 1324];
- s. Debtors and Debtors in Possession Witness and Exhibit List for February 18, 2025 Hearing at 9:00 a.m. (prevailing Central Time) [Docket No. 1380];
- t. The Statutory Unsecured Claimholders' Committee's Witness and Exhibit List for February 18, 2025 Hearing Regarding Debtors' Solicitation Procedures Motion [Docket No. 1388];
- u. Second Objection of Cobb County, Georgia, and Cobb County Sheriff to Debtor's Motion for Entry of an Order (I) Approving the Adequacy of the Disclosure Statement, (II) Approving the Solicitation and Notice Procedures with Respect to Confirmation of the Debtor's Proposed Joint Plan of Reorganization, (III) Approving the Forms of Ballots and Notices in Connection Therewith, (IV) Scheduling Certain Dates with Respect Thereto, and (V) Granting Related Relief [Docket No. 1392];
- v. Notice of Filing of Second Amended Joint Chapter 11 Plan of Reorganization of Wellpath Holdings, Inc. and Certain of its Debtor Affiliates [Docket No. 1408];
- w. Notice of Filing of Second Amended Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Wellpath Holdings, Inc. and Certain of its Debtor Affiliates [Docket No. 1411];
- x. Objection of Kristin Allred, Victoria Klein, and Mike Doyle to Approval of Disclosure Statement for the Joint Chapter 11 Plan of Wellpath Holdings, Inc. and Certain of its Debtor Affiliates [Docket No. 1308];
- y. Notice of Filing of Further Revised Disclosure Statement Order [Docket No. 1412];
- z. Debtors' Omnibus Reply in Support of, and in Response to Objections to, Approval of the (I) Adequacy of the Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Wellpath Holdings, Inc. and Certain of its Debtor Affiliates, (II) Solicitation and Notice Procedures, (III) Forms of Ballots and Notices, and (IV) Confirmation Schedule [Docket No. 1425];

- aa. Notice of Filing of Third Amended Joint Chapter 11 Plan of Reorganization of Wellpath Holdings, Inc. and Certain of Its Debtor Affiliates [Docket No. 1430];
  - bb. Notice of Filing of Third Amended Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Wellpath Holdings, Inc. and Certain of its Debtor Affiliates [Docket No. 1431]; and
  - cc. Notice of Filing of Third Further Revised Exhibits to Disclosure Statement Order [Docket No. 1432].
3. **Emergency Motion to Extend Deadlines Hearing.** The Statutory Unsecured Claimholders' Committee's Emergency Motion to Extend the Deadlines for (I) the Bid Procedures Order and (II) the Solicitation Procedures Motion [Docket No. 1022].

Status: This matter is going forward with respect to the Solicitation Procedures Motion.

Related Documents:

- a. Declaration of William Wicker in Support of the Statutory Unsecured Claimholders' Committee's Emergency Motion to Extend the Deadlines for (I) the Bid Procedures Order and (II) the Solicitation Procedures Motion [Docket No. 1022];
- b. Notice of Hearing on Emergency Motion to Extend the Deadlines for (I) the Bid Procedures Order and (II) the Solicitation Procedures Motion [Docket No. 1039];
- c. Notice of Status Conference [Docket No. 1047];
- d. The Statutory Unsecured Claimholders' Committee's Witness and Exhibit List for January 27, 2025 Hearing [Docket No. 1097];
- e. Debtors and Debtors in Possession Witness and Exhibit List for January 27, 2025 Hearing [Docket No. 1099];
- f. Debtors and Debtors in Possession Witness and Exhibit List for February 18, 2025 Hearing at 9:00 a.m. (prevailing Central Time) [Docket No. 1380];
- g. Debtors' Objection to the Statutory Unsecured Claimholders' Committee's Emergency Motion to Extend the Deadlines for (I) the Bid Procedures Order and (II) Solicitation Procedures Motion [Docket No. 1424];

- h. The Ad Hoc Lender Group's (I) Response to the Statutory Unsecured Claimholders' Committee's Objection to the Debtors' Disclosure Statement Motion and (II) Joinder to the Debtors' Objection to the Statutory Unsecured Claimholders' Committee's Emergency Extension Motion [Docket No. 1428]; and
  - i. Supplement to Objections of Claimants to Debtors' Disclosure Statement for Plan of Reorganization [Docket No. 1463].
- 4. **KEIP/KERP Motion.** Debtors' Motion for Entry of An Order (I) Authorizing and Approving the Debtors' (A) Key Employee Incentive Plan and (B) Non-Insider Key Employee Retention Plan and (II) Granting Related Relief [Docket No. 1010].

Status: This matter is going forward.

Related Documents:

- a. Declaration of Gilbert Jones in Support of Debtors' Motion for Entry of an Order (I) Authorizing and Approving the Debtors' (A) Key Employee Incentive Plan and (B) Non-Insider Key Employee Retention Plan and (II) Granting Related Relief [Docket No. 1010-1];
- b. Certificate of Mailing of Claims Agent re Debtors' Motion for Entry of an Order (I) Authorizing and Approving the Debtors' (A) Key Employee Incentive Plan and (B) Non-Insider Key Employee Retention Plan and (II) Granting Related Relief [Docket No. 1081];
- c. The Statutory Unsecured Claimholders' Committee's Witness and Exhibit List for February 10, 2025 Hearing [Docket No. 1252];
- d. Debtors and Debtors in Possession Witness and Exhibit List for February 10, 2025 Hearing [Docket No. 1254];
- e. United States Trustee's Witness and Exhibit List for February 10, 2025 Hearing [Docket No. 1264];
- f. Objection of the United States Trustee to Debtors' Motion for Entry of an Order (I) Authorizing and Approving the Debtors' (A) Key Employee Incentive Plan and (B) Key Employee Retention Plan, and (II) Granting Related Relief [Docket No. 1286];
- g. The Statutory Unsecured Claimholders' Committee's Objection to Debtors' Motion for Entry of an Order (I) Authorizing and Approving the Debtors' (A) Key Employee Incentive Plan and (B) Non-Insider Key Employee Retention Plan and (II) Granting Related Relief [Docket No. 1291];

- h. Declaration of Heather L. Barlow in Support of the Statutory Unsecured Claimholders' Committee's Objection to Debtors' Motion for Entry of an Order (I) Authorizing and Approving the Debtors' (A) Key Employee Incentive Plan and (B) Non-Insider Key Employee Retention Plan and (II) Granting Related Relief [Docket No. 1292];
- i. Declaration of Timothy J. Dragelin as Chief Restructuring Officer and Chief Financial Officer of Wellpath Holdings, Inc. and Certain of its Affiliates in Support of Order Debtors' Motion for Entry of an Order (I) Authorizing and Approving the Debtors' (A) Key Employee Incentive Plan and (B) Non-Insider Key Employee Retention Plan and (II) Granting Related Relief [Docket No. 1384];
- j. Supplemental Declaration of Gilbert Jones in Support of, and in Response to Objections to, Debtors' Motion for Entry of an Order (I) Authorizing and Approving the Debtors' (A) Key Employee Incentive Plan and (B) Non-Insider Key Employee Retention Plan and (II) Granting Related Relief [Docket No. 1386];
- k. Debtors and Debtors in Possession Witness and Exhibit List for February 18, 2025 Hearing at 4:00 p.m. (prevailing Central Time) [Docket No. 1389];
- l. The Statutory Unsecured Claimholders' Committee's Amended Witness and Exhibit List for February 18, 2025 Hearing Regarding Debtors' KEIP/KERP Motion [Docket No. 1387];
- m. Amended Supplemental Declaration of Gilbert Jones in Support of, and in Response to Objections to, Debtors' Motion for Entry of an Order (I) Authorizing and Approving the Debtors' (A) Key Employee Incentive Plan and (B) Non-Insider Key Employee Retention Plan and (II) Granting Related Relief [Docket No. 1422];
- n. Reply in Support of, and in Response to Objections to, Debtors' Motion for Entry of an Order (I) Authorizing and Approving the Debtors' (A) Key Employee Incentive Plan and (B) Non-Insider Key Employee Retention Plan and (II) Granting Related Relief [Docket No. 1426];
- o. Debtors and Debtors in Possession Amended Witness and Exhibit List for February 18, 2025 Hearing at 4:00 p.m. (prevailing Central Time) [Docket No. 1427]; and
- p. Supplemental Declaration of Heather L. Barlow in Support of the Statutory Unsecured Claimholders' Committee's Objection to Debtors' Motion for Entry of an Order (I) Authorizing and Approving the Debtors' (A) Key Employee Incentive Plan and (B) Non-Insider Key Employee Retention Plan and (II) Granting Related Relief [Docket No. 1429].

**PLEASE TAKE FURTHER NOTICE** that you may participate in the hearing either in person or by an audio or video connection. Audio communication will be by use of the Court's dial-in facility. You may access the facility at 1 (832) 917-1510. Once connected, you will be asked to enter the conference room number. Judge Perez's conference room number is 282694. Video communication will be by use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Pérez's home page <https://www.txs.uscourts.gov/page/united-states-bankruptcy-judge-alfredo-r-perez>. The meeting code is "JudgePerez". Click the settings icon in the upper right corner and enter your name under the personal information setting.

**PLEASE TAKE FURTHER NOTICE** that hearing appearances must be made electronically in advance of both electronic and in-person hearings. To make your electronic appearance, click the "Electronic Appearance" link on Judge Pérez's home page. Select the case name, complete the required fields and click "Submit" to complete your appearance.

**PLEASE TAKE FURTHER NOTICE** that all documents filed in these chapter 11 cases are available free of charge by visiting <https://dm.epiq11.com/Wellpath>. Copies of any pleadings or papers filed with the Court may also be obtained by visiting the Court's website at <https://ecf/txsb.uscourts.gov> in accordance with the procedures and fee set forth therein.

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Dated: February 21, 2025  
Dallas, Texas

/s/ Marcus A Helt

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*Counsel for the Debtors and Debtors in Possession*

**CERTIFICATE OF SERVICE**

I certify that on February 21, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Marcus A Helt

Marcus A Helt